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6 Attorney for Defendant  
JOSE FERNANDO GOMEZ-MOREIRA

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSE FERNANDO GOMEZ-MOREIRA,

15 Defendant.

Case No. 1:20-cr-00151-JLT

STIPULATION TO EXTEND  
COMPASSIONATE RELEASE  
BRIEFING SCHEDULE;  
[PROPOSED] ORDER

16  
17 Jose Fernando Gomez-Moreira filed a pro se 18 U.S.C. § 3582(c) motion on March 3,  
18 2023, and counsel was appointed. A briefing schedule was established whereby any  
19 supplemental briefing to defendant's pro se motion is due May 12, 2023; the government's  
20 response to defendant's motion and any supplemental briefing is due June 12, 2023; and any  
21 reply is due June 27, 2023.

22 **IT IS HEREBY STIPULATED** by and between the parties through their respective  
23 counsel, JOSEPH BARTON, Assistant United States Attorney, counsel for plaintiff, and  
24 LAURA MYERS, Assistant Federal Defender, counsel for defendant, that these dates be  
25 extended 30 days and the schedule set as follows:

26 **June 12, 2023:** Any Supplemental Briefing to Defendant's pro se 18 U.S.C.  
27 § 3582(c) Motion filed on March 3, 2023

28 **July 12, 2023:** Plaintiff's Response to Defendant's 18 U.S.C. § 3582(c) Motion  
filed on March 3, 2023, or any supplemental briefing thereto

**July 27, 2023:** Defendant's Reply

Defendant Gomez-Moreira pled guilty to one count of illegal re-entry on June 10, 2021. He was sentenced to a 72-month term of imprisonment. Mr. Gomez-Moreira is housed at FCI Lompoc, and his projected release date is October 13, 2025. Upon appointment, the Federal Public Defenders Office sent medical releases and other documents to Mr. Gomez-Moreira. In addition, undersigned counsel spoke with him to confirm his desire for appointed counsel, as requested in his pro se § 3582(c) motion. At this point, his medical records have not been obtained. Additional time is requested to acquire the necessary medical records.

Respectfully submitted,

PHILLIP TALBERT  
United States Attorney

DATED: May 9, 2023

By: /s/ Joseph Barton  
JOSEPH BARTON  
Assistant United States Attorney  
Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

DATED: May 9, 2023

By: /s/ Laura Myers  
LAURA MYERS  
Assistant Federal Defender  
Attorney for Defendant  
JOSE FERNANDO GOMEZ-MOREIRA

**[PROPOSED] ORDER**

IT IS SO ORDERED.

Dated: **May 11, 2023**

  
UNITED STATES DISTRICT JUDGE